

**REMARKS**

Claims 1-18 are pending in this application. Claim 9 has been amended in response to the instant Office Action. No new matter is added by the amendment to claim 9.

**ALLOWABLE SUBJECT MATTER**

Applicant gratefully acknowledges the Examiner's indication that claims 3-8, 10-15 and 18 would be allowable if rewritten in independent form to include all the limitations of the base claim, and any intervening claims.

Applicants reserve the right to rewrite the allowable claims in independent form in a subsequent response or communication.

**REJECTION UNDER 35 U.S.C. § 102**

Reconsideration is respectfully requested of the rejection of claim 9 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Pub. No. 2002/0145472 ("Oh").

Claim 9 has been amended to recite a multi-bit quantizer for quantizing an accumulated value output from a last one of the plurality of operation units into a plurality of bits.

Applicant respectfully submits that Oh fails to disclose the claimed multi-bit quantizer.

Accordingly, for at least this reason, Applicant submits that claim 9 is not anticipated by the cited reference, and respectfully requests that the Examiner withdraw the rejection of claim 9 under 35 U.S.C. § 102.

**REJECTION UNDER 35 U.S.C. § 103**

Reconsideration is respectfully requested of the rejection of claims 1-2 and 16-17 under 35 U.S.C. § 103 as being unpatentable over Oh in view of U.S. Patent No. 6,980,139 ("Doerrerr").

Applicant notes that the U.S. filing date of Doerrerr (August 28, 2003) is after the claimed foreign priority date (November 22, 2002) of the present application. Applicant also notes that, pursuant to sections 2136.03, 706.02(b) and 201.15 of the Manual of Patent Examining Procedure, M.P.E.P. §§ 2136.03, 706.02(b) and 201.15 (Rev., Sept. 2007), Doerrerr may be precluded from being used as a ground for rejection if Applicant submits an appropriate English translation of Korean Patent Application No. 2002-73050 ("050 application"). Accordingly, Applicant files herewith an English translation of the certified copy of the '050 application and a statement that the translation is accurate.

Further, Applicant notes that the appropriate section 102(e) date of Doerrerr is the U.S. filing date of August 28, 2003 since the reference did not result or claim the benefit of an international application that designated the United States and was not published under PCT Article 21(2) in English. See M.P.E.P. § 706.02(f)(1).

Therefore, Applicant submits that because the foreign priority date of the '050 application (November 22, 2002) is prior to the effective date of Doerrerr (August 28, 2003), Doerrerr cannot be used as a reference to support a rejection under section 103(a).

Accordingly, the rejection of claims 1, 2 and 16, 17 under 35 U.S.C. § 103(a) is legally deficient, and Applicant respectfully requests that the Examiner withdraw same.

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, the Examiner may telephone Applicant's Attorney to reach a prompt disposition of this application.

Respectfully submitted,

A handwritten signature in black ink, reading "Michael F. Morano", written over a horizontal line.

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